1 2 3 4 5	PHILIP M. MILLER (SBN 87877) KRISTEN McCULLOCH (SBN 177558) SALTZMAN & JOHNSON LAW CORPORATI 120 Howard Street, Suite 520 San Francisco, CA 94105 (415) 882-7900 (415) 882-9287 – Facsimile pmiller@sjlawcorp.com kmcculloch@sjlawcorp.com	ON	
6	Attorneys for Plaintiffs		
7			
8 9	IN THE UNITED STAT FOR THE NORTHERN DI (SAN FRANCIS	STRICT OF	CALIFORNIA
10 11 12 13 14	CALIFORNIA SERVICE EMPLOYEES HEALTH & WELFARE TRUST FUND, MIKE GARCIA, Trustee, CHARLES GILCHRIST, Trustee, RAYMOND C. NANN, Trustee, LARRY T. SMITH, Trustee, Plaintiffs, vs.	REDAC DECLA SHANK PLAINT	: C 07-04945 TEH TED VERSION OF THE RATION OF CRYSTAL S IN SUPPORT OF TIFFS' MOTION FOR PARTIAL ENT BY DEFAULT
16 17 18	A & B MAINTENANCE, INC., a California corporation, Defendant.	Date: Time: Judge:	January 7, 2008 10:00 a.m. Hon. Thelton E. Henderson Courtroom 12, 19th Floor
19	I, Crystal Shanks, state:		
20	1. I am an Assistant Vice President a	nd Denartme	ent Head of the Employer
21 22	Accounting Department for Associated Third Par California Service Employees Health & Welfare	ty Administ	rators which is employed by Plaintiff
23		·	,
24	things, the Trust's health and welfare plan and act		
25	members and their employers signatory to collect	ive bargaini	ng agreements. I direct a staff which
26	records and maintains monthly reports from empl	oyers of hou	rs worked by their covered
27	employees and of contributions due from each co.	ntributing er	mployer. Under my direction, my
28	denartment maintains records of nayments receive	ed by contril	outing employers, and calculates and

bills employers for liquidated damages and interest due under the Trust Agreement and under the collection policy of the Fund for monthly delinquencies. (See Exhibits A-C to the Declaration of Philip M. Miller filed herewith). My department obtains and retains collective bargaining agreements between contributing employers and local unions affiliated with the Trust which create the employer's obligation to contribute to the Fund. The data are recorded close in time to the events to which they pertain and are created and maintained in the ordinary course of business of the Trust.

- 2. My department has on file the Maintenance Contractors Market Agreement between Defendant A & B Maintenance, Inc. ("A & B") and Local 1877 California Service Employees International Union ("Local 1877") for the period March 1, 2001 through February 28, 2005, and the Memorandum of Agreement between A & B and Local 1877, effective October 3, 2005. (See Exhibits A, and B, respectively, to the Declaration of Adolfo Gamez filed herewith).
- Exhibit D to Declaration of Adolfo Gamez filed herewith), A & B has failed to submit monthly reports for all of its covered employees and to pay contributions due on their behalf for hours worked during the period October 2005 through May 2006. Attached hereto as Exhibit A is a collective report of contributions submitted by A & B for the period November 2005 through May 2006. Further, A & B has failed to submit monthly reports of covered employees, or to pay contributions due on their behalf, for the period May 2007 through October 2007. Under my direction, a report entitled "A and B Maintenance Account #01300 Unpaid Employee List for the Period October 2005 through October 2007 Hours" was compiled in order to identify employees of A & B who have not been reported, but are covered under the Agreements. A true and correct copy of the list is attached hereto as Exhibit B.

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1	4. In instances where an employer fails to submit a report, contributions are estimated
2	based on the last received report, in accordance with Trust policy. Based upon Exhibits A and B,
3	under my supervision this office calculated estimated contributions owed by A & B to the Trust.
4	We estimate that a total of \$89,384.25 is owed by A & B for delinquent contributions, liquidated
5	damages and interest due for the periods October 2005 through May 2006 and May 2007 through
6	October 2007; and liquidated damages and interest assessed on contributions paid late during the
7	period August 2006 through April 2007. A spreadsheet prepared by my staff under my
8	supervision, itemizing the total estimated delinquency of A & B, is attached hereto as Exhibit C.
9	I declare under penalty of perjury that the foregoing is true and correct and if called upon
11	
12	as a witness, I could testify to the foregoing on the basis of my personal, direct knowledge.
13	Executed this 29 th day of November, 2007, at Alameda, California.
14	
15	Curlet Mul CRYSTAL SHANKS
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	Case 3:07-cv-04945-TEH Document 15 Filed 12/13/2007 Page 4 of 14
1	PROOF OF SERVICE
2	I am employed in the County of San Francisco, State of California. I am over the age of
3	eighteen and not a party to this action. My business address is 120 Howard Street, Suite 520, San
4	Francisco, California 94105.
5	On November 30, 2007, I served the following documents on the parties to this action,
6	addressed as follows, in the manner described below:
7	DECLARATION OF CRYSTAL SHANKS IN SUPPORT
8	OF PLAINTIFFS' MOTION FOR PARTIAL JUDGMENT BY DEFAULT
9	XX MAIL, being familiar with the practice of this office for the collection and the processing
10	of correspondence for mailing with the United States Postal Service, and deposited in the United States Mail copies of the same to the business addresses set forth below, in a sealed
11	envelope fully prepared.
12	Addressed to:
13	A & B Maintenance, Inc. 405 East Gardena Blvd., Suite A
14	Gardena, CA 90247
15	I declare under penalty of perjury that the foregoing is true and correct and that this
16	declaration was executed on this 30th day of November, 2007 at San Francisco, California.
17	declaration was executed on this soul day of the
18	Attu tellen
19	Julie Jellen
20	
21	
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EXHIBIT A TO DECLARATION OF CRYSTAL SHANKS IN SUPPORT OF PLAINTIFFS' MOTION

FOR PARTIAL JUDGMENT BY DEFAULT

7,982.80

MEDICAL INS. PMT.

TOTAL:

CALIFORNIA SERVICE EMPLOYEE HEALTH AND WELFARE

A&BMAINTENANCE,INC. 405 E. Gardena Blvd. Suite #A

Gardena, CA 90247 Ph: 310-768-1458

TRUST FUND
CONTRIBUTION REPORT

CONTRIBUTION NOV DEC. O5 TO JAN THRU MAY 06	3,991.40	3,991.40
CC TERMINATED	5/15/06	
START DATE	10/18/05	10/18/05
STORE# PAY RATE	10.25	10.25
STORE #	632	632
UNION EMPLOYEES'	ARENAS, TRINDAD	MORALES, ARRON
EMPLOYEE ID	8765	

MANAGER SIGNATURE:

EXHBITA

EXHIBIT B

TO DECLARATION OF

CRYSTAL SHANKS

IN SUPPORT OF PLAINTIFFS' MOTION

FOR PARTIAL JUDGMENT BY DEFAULT

H&W AMOUNT DUE COMMENTS	570.20 PER LIST PROVIDED BY EMPLOYER 570.20 PER LIST PROVIDED BY EMPLOYER 1,140.40	570.20 PER LIST PROVIDED BY EMPLOYER 570.20 PER LIST PROVIDED BY EMPLOYER, 140.40	570.20 PER LIST PROVIDED BY EMPLOYER 570.20 PER LIST PROVIDED BY EMPLOYER,140.40	PER LIST PROVIDED BY PER LIST PROVIDED BY	570.20 PER LIST PROVIDED BY EMPLOYER 570.20 PER LIST PROVIDED BY SEIU 570.20 PER LIST PROVIDED BY EMPLOYER 710.60	570.20 PER LIST PROVIDED BY EMPLOYER 570.20 PER LIST PROVIDED BY SEIU 570.20 PER LIST PROVIDED BY EMPLOYER 7710.60	570.20 PER LIST PROVIDED BY EMPLOYER 570.20 PER LIST PROVIDED BY SEIU 570.20 PER LIST PROVIDED BY EMPLOYER 1,710.60	570.20 PER LIST PROVIDED BY EMPLOYER 570.20 PER LIST PROVIDED BY SEIU 570.20 PER LIST PROVIDED BY SEIU 570.20 PER LIST PROVIDED BY EMPLOYER 2.280.80
H&W AMOUN	& & &	T	& & &	& & %	₩ ₩ ₩ ₩	w w w	<i></i>	फ फ फ फ
SSN	xxx-xx-8765 xxx-xx-7113	xxx-xx-8765 xxx-xx-7113	xxx-xx-8765 xxx-xx-7113	xxx-xx-8765 xxx-xx-7113	xxx-xx-8765 xxx-xx-1063 xxx-xx-7113	xxx-xx-8765 xxx-xx-1063 xxx-xx-7113	xxx-xx-8765 xxx-xx-1063 xxx-xx-7113	xxx-xx-8765 xxx-xx-1063 xxx-xx-4330 xxx-xx-7113
FIRST NAME	TRINIDAD	TRINIDAD AARON	TRINIDAD	TRINIDAD	TRINIDAD AURELIO AARON	TRINIDAD AURELIO AARON	TRINIDAD AURELIO AARON	TRINIDAD AURELIO IVAN AARON
LAST NAME	ARENAS MORALES	ARENAS MORALES	ARENAS MORALES	ARENAS MORALES	ARENAS FLORES MORALES	ARENAS FLORES MORALES	ARENAS FLORES MORALES	ARENAS FLORES MORALES MORALES
WORK MONTH	1010	NOVEMBER 2005 NOVEMBER 2005	DECEMBER 2005 DECEMBER 2005	JANUARY 2006 JANUARY 2006	FEBRUARY 2006 FEBRUARY 2006 FEBRUARY 2006	MARCH 2006 MARCH 2006 MARCH 2006	APRIL 2006 APRIL 2006 APRIL 2006	MAY 2006 MAY 2006 MAY 2006 MAY 2006



A and B MAINTENANCE ACCOUNT #01300 UNPAID EMPLOYEE LIST FOR PERIOD OCTOBER 2005 THROUGH OCTOBER 2007 HOURS

HINOM VICTORY	I AST NAME	FIRST NAME	NSS	H&W AMOUN	H&W AMOUNT DUE COMMENTS
WORK WON I			-		
JUNE 2006 THRO	JUNE 2006 THROUGH APRIL 2007 HOURS - CONTRI	RIBUTIONS PAID	Ω		
		BFRNARDO	xxx-xx-7561	\$	PER LIST
MAY 2007	3	DAVID	xxx-xx-1324	\$	PER
MAY 2007		ANTONIO	xxx-xx-8863	S	PER LIST PROVIDED
MAY 2007	RA	JESUS	xxx-xx-8991		PER LIST PROVIDED
MAY 2007	FI AZOUEZ	MARIO	9887-xx-xxx	\$	PER LIST PROVIDED
MAY 2007		MARCIANO	xxx-xx-5936		PER LIST PROVIDED BY
MAY 2007	Z-NAVA	EDGAR	xxx-xx-7564	\$	_
MAT 2007		ELLIOTT	xxx-xx-1701	\$	PEK LIST PROVIDED BY
MAY 2007		DORNELL	xxx-xx-4594	8	PER LIST PROVIDED BY
MAT 2007		JAVIER	xxx-xx-9662	↔	TIE TIE
MAY 2007		PEDRO	xxx-xx-7123	\$	PER LIST PROVIDED BY
IMAY 2007	I ES	AARON	xxx-xx-7113	\$	PER LIST PROVIDED BY
MAY 2007		IVAN	xxx-xx-4330	\$	PER LIST PROVIDED BY
MAY 2007	MORALES	AIDE	0068-xx-xxx	\$	LIST PROVIDED BY
MAY 2007	KEYES (FI OBES)	VI IDEI IO	xxx-xx-1063	S	579.80 PER LIST PROVIDED BY SEIU
MAY 2007	I UKKUBIAKI ES (FLORES) AGINE	אסואבוס			8,697.00
	Acceptance of the second secon	DEBNIADO	1997-xx-xx	8	579.80 PER LIST PROVIDED BY SEIU
JUNE 2007	ALVAREZ 	BERINARDO	xxx-xx-1324	\$	BX
JUNE 2007	AMAKALES	CHACILLO	×××-×××	€	PROVIDED BY
JUNE 2007	AYALA	ANIONIO	×××-××-8991	₩.	579.80 PER LIST PROVIDED BY SEIU
JUNE 2007	CABRERA	JESUS	1660-88-888	<i>∀</i>	579.80 PER LIST PROVIDED BY SEIU
JUNE 2007	GOMEZ-VELAZQUEZ	MAKIO	SOO1-XX-XXX	θ	+
JUNE 2007	HERNANDEZ	MARCIANO	77.7 XXX	→ (1
JUNE 2007	HERNANDEZ-NAVA	EDGAK	XXX-XX-1304	9 6	PFR LIST
JUNE 2007	JONES	ELLIO11	XXX-XX-1701	9 6	PER IST
.II.INF 2007	LITTLE	DORNELL	XXX-XX-4584	9 €	DER LIST
11 INE 2007	LUCERO	JAVIER	7996-xx-xxx	A	DED LIST DROVINED BY
II INE 2007	MEZA	PEDRO	xxx-xx-7123	<i>></i>	PER CIST FIGURED BY
JUNE 2007	MORALES	AARON	xxx-xx-7113	÷ >	PER LIST FROVIDED BY
JUNE 2007	MORALES	IVAN	xxx-xx-4330	\$	PER LIST PROVIDED BY
JUNE 2007	REYES	AIDE	0068-xx-xxx	÷	SU PER LIST FROVIDED DI
JUNE 2007	THRUBIARTES (FLORES)) AURELIO	xxx-xx-1063	S	דבא רוטן דאט יוטרט טי
JOINE 2001				8	8,697.00
7000 / 11 11	AI VAREZ	BERNARDO	xxx-xx-7561	\$	579.80 PER LIST PROVIDED BY SEIO
JULY 2007	HL V 711 1 L-6				

Ca-svc/Reconciliations/A and B Maintenance.xls Created on: 11/21/07

		FIRST NAME	SSN	H&W AMOUNT DUE COMMENTS	NTS
WORK MONTH	LASI NAME			t	
	C L	UAVID	xxx-xx-1324	579.80	PROVIDED BY
JULY 2007	AMAKALES	ANTONIO	xxx-xx-8863	PER	T PROVIDED BY SEIU
JULY 2007		IFSUS	xxx-xx-8991	579.80 PER	PROVIDED BY
JULY 2007		MARIO	200 - 100 -	579.80	
JULY 2007	GOINIEZ-VELAZGOLZ	MARCIANO	xxx-xx-5936		PROVIDED BY
JULY 2007	HEKINANDEZ	FUGAR	xxx-xx-7564	579.80	PROVIDED
JULY 2007	HEKINANDEZ-INAVA	MARZETTE	xxx-xx-5011	579.80	PROVIDED BY
JULY 2007	JACKSON	INDIA I	xxx-xx-1701	_	PER LIST PROVIDED BY SEIU
JULY 2007	JONES	DODNE!	xxx-xx-4594	579.80	PER LIST PROVIDED BY SEIU
JULY 2007	LITTLE	DORINELL	2996-xx-xxx	579.80	B
JULY 2007	LUCERO	JAVIER	xxx-xx-7123	579.80	PER LIST PROVIDED BY SEIU
,IUI Y 2007	MEZA	FEURO	7440	+	PER LIST PROVIDED BY SEIU
11 II V 2007	MORALES	AARON	\$117-XX-XXX	579.80	PER LIST PROVIDED BY SEIU
JUL 1 2007	MORALES	IVAN	xxx-xx-4330	570 80	
JULI 2007	RFYFS	NEREO	xxx-xx-1809	00.872	BY
JUL Y 2007	DEVEC	AIDE	0068-xx-xxx	27.9.00	
JULY 2007	CAL OMON	FERNANDO	xxx-xx-5763	-	ST FROVIDED BY SELLS
JULY 2007	THE OBESTALIBITED (EL OBESTALIBEL IO	NALIREL 10	xxx-xx-1063		ים טוטויטאד
JULY 2007	I UKKUBIAKI ES (I ESI (ES			\$ 10,436.40	
		IREBNARDO	xxx-xx-7561	579.80 PER	TROVIDED BY
AUGUST 2007	ALVAKEZ	DAVID.	xxx-xx-1324	579.80 PER	PROVIDED BY
AUGUST 2007	AMAKALES	CINCTIA	8988-xx-xxx	24.80	
AUGUST 2007	AYALA	ANIONIO	87X-XX-4829	579.80	PROVIDED BY
AUGUST 2007	BADILLO	CELINA	222 XX XXX	\$ 579.80 PER LIST	PROVIDED BY
AUGUST 2007	BELTRAN	MARVIN	XXX-XX-2343		PROVIDED BY
AUGUST 2007	CABRERA	JESUS	1660-XX-XXX	579.80	IST PROVIDED BY SEIU
AHGHST 2007	GOMEZ-VELAZQUEZ	MARIO	SOOJ-XX-XXX	579.80	PER LIST PROVIDED BY SEIU
ALIGHST 2007	HERNANDEZ	MARCIANO	XXX-XX-5936	_	IST PROVIDED BY SEIU
ALIGHST 2007	HERNANDEZ-NAVA	EDGAR	400.7-XX-XXX	579 80	PER I IST PROVIDED BY SEIU
VIIGHST 2007	JACKSON	MARZETTE	I LOG-XX-XXX	579 80	IST PROVIDED BY SEIU
AUGUST 2007	SENCI	ELLIOTT	xxx-xx-1/01	670 80	IST PROVIDED BY SEIU
AUGUS1 2007	4 1 1	DORNELL	xxx-xx-4594	37 9.80 FEN	PROVINED BY
AUGUST 2007	I I I DEBO	JAVIER	xxx-xx-9662	5/9.80 PER	PROVIDED BY
AUGUST 2007	MEZA	PEDRO	xxx-xx-7123	08.676	
AUGUST 2007	MOBALES	AARON	xxx-xx-7113	-	IST PROVIDED DI SEIS
AUGUST 2007	MORALLS	IVAN	xxx-xx-4330	579.80	
AUGUST 2007	MORALES	DFI IA	8EZ-9-XX-XXX	579.80	
AUGUST 2007	QUIRUS	NFRFO	xxx-xx-1809	\$ 579.80 PER	PER LIST PROVIDED BY SELU
AUGUST 2007	KEYES	>			
					1

Ca-svc/Reconciliations/A and B Maintenance.xls Created on: 11/21/07

	NAME	FIRST NAME	SSN	H&W AMOUNT DUE COMMENTS	COMMENTS
WORK MONIN					נו
		AIDE	0068-xx-xxx		PER LIST PROVIDED BY
AUGUST 2007	NO	FERNANDO	xxx-xx-5763	\$ 579.80	PEK LIST PROVIDED BY
AUGUST 2007	SALCINION TEN (EL ODES) AL	ALIRFI IO	xxx-xx-1063		PEK LIST PROVIDED B
AUGUST 2007	UKKUBIAK ES (ESI (ES)			12,175.80	0
					A TREE LIST BROWINED BY SFILL
7000	I VI VADE 7	BERNARDO	xxx-xx-7561	\$ 278.00	PEN LIST PROVIDED BY
SEPTEMBER 2007	ALVANCE	CIRIACA	xxx-xx-5320		TEK LIST PROVIDED BY
SEPTEMBER 2007	ALVAREZ	DAVID	xxx-xx-1324		PEK LIST PROVIDED BY
SEPTEMBER 2007	AWARALES	OINOTING	XXX-XX-8863		PER LIST PROVIDED BY
SEPTEMBER 2007	AYALA	CELINA	xxx-xx-4829	\$ 579.80	-
SEPTEMBER 2007	BADILLO	MADVIN	xxx-xx-7549	\$ 579.80	
SEPTEMBER 2007	BELTRAN	711 A 1 T 1 T 1 T 1 T 1 T 1 T 1 T 1 T 1 T	,vvv_vv_8001	\$ 579.80	
SEPTEMBER 2007	CABRERA	JESUS	7880 *** ***	\$ 579.80	
CEDTEMBER 2007	GOMEZ-VELAZQUEZ	MAKIO	XXX-XXX		80 PER LIST PROVIDED BY SEIU
SEDTEMBER 2007	HERNANDEZ	MARCIANO	OCSC-XX-XXX		_
SEF I LIMBER 2007	HERNANDEZ-NAVA	EDGAR	XXX-XX-1,504		_
SEP LEMBER 2007	NO X JOY	MARZETTE	xxx-xx-5011		PEN EIST HOUSE E
SEPIEMBER 2007	JACKSON	FILIOTT	xxx-xx-1701		PER LIST PROVIDED DY
SEPTEMBER 2007	JOINES	DORNE! I	xxx-xx-4594		PEK LIST PROVIDED BY
SEPTEMBER 2007		IAVIER	xxx-xx-9662		PER LIST PROVIDED BY
SEPTEMBER 2007	LUCERO	DENDO	xxx-xx-7123		PER LIST PROVIDED BY
SEPTEMBER 2007	MEZA	T LDING	vxx-xx-7113	\$ 579.80	
SFPTEMBER 2007	MORALES	AAKON	057 VX XXX	\$ 579.80	
SEPTEMBER 2007	MORALES	IVAN	××××××6738		PER LIST PROVIDED BY
SEPTEMBER 2007	QUIROS	DELIA	744-74-000		PER LIST PROVIDED BY
SEPTEMBER 2007	REYES	NEREO	6001-XX-XXX		-
SEDTEMBER 2007	REYES	AIDE	0088-XX-XXX		_
SELICMBER 2007	SALOMON	FERNANDO	xx-xx-xx/63		
SEPTEMBER 2007	TURRUBIARTES (FLORES) AURELIO	S) AURELIO	xxx-xx-1063	12 745 60	_
OLT I LIVIDLI 1 EGG					
					679 80 TPER LIST PROVIDED BY SEIU
7000 0000000	AI VARFZ	BERNARDO	1967-xx-xxx		
OCIOBER 2007	ALVAREZ	CIRIACA	xxx-xx-5320	\$ 27.8	PER EIST I NOVIDED BY
OCTOBER 2007	AMADAI ES	DAVID	xxx-xx-1324		PER CIST FILOVIECE EN
OCTOBER 2007		OINCLIA	xxx-xx-8863		PEK LIST PROVIDED BY
OCTOBER 2007	AYALA	VIVI	xxx-xx-4829		PER LIST PROVIDED BY
OCTOBER 2007	BADILLO	CELINA	952-xx-xxx		PER LIST PROVIDED BY
OCTOBER 2007	BELTRAN	WIARVIIV	1968-XX-XXX	\$ 57	579.80 PER LIST PROVIDED BY SEIU
OCTOBER 2007	CABRERA	JESUS	0802 707 707		579.80 PER LIST PROVIDED BY SEIU
OCTOBER 2007	GOMEZ-VELAZQUEZ	MARIO	COO 1-XX-XXX		

Ca-svc/Reconciliations/A and B Maintenance.xls Created on: 11/21/07

		FIRST NAME	SSN	H&W AMOUNT DUE COMMENTS	\neg
WORK MONTH	LASI NAME				Γ
			0001	479 80 PFR LIST PROVIDED BY SEIU	
	I LUNIANIDEZ	MARCIANO	XXX-XX-59330		Γ
OCTOBER 2007	HERIVAIVE	OV JUL	xxx-xx-7564	\$ 579.80 PER LIST PROVIDED BY SETO	$\overline{}$
OCTOBER 2007	HERNANDEZ-NAVA	EDGAR	F044	© 579.80 PER LIST PROVIDED BY SEIU	-
2002	IACKSON	MARZEIIE	110C-XX-XXX	STO SO DED LIST DROVIDED BY SELU	
	11111111	MARIA	xxx-xx-5432	\$ 078.00 TEN LIGHT (NOVICED BY OFFILE	Т
OCTOBER 2007	JIMENEZ		×××-××-1701	\$ 579.80 PER LIST PROVIDED BY SEIU	Т
OCTOBER 2007	JONES	ELLIOI I	1011 VV-VVV	\$ 579 80 PFR LIST PROVIDED BY SEIU	
		DORNELL	XXX-XX-4584		<u> </u>
OCTOBER 2007		INVIER	xxx-xx-9662	\$ 5/9.80 PER LIST PROVIDED BY SELO	Т
OCTOBER 2007	LUCERO	377151	2007 70000	\$ 579.80 PER LIST PROVIDED BY SEIU	1
OCTOBER 2007	MEZA	PEDKO	77.7-XXX	679 80 PER LIST PROVIDED BY SEIU	
	MODAL EN	AARON	xxx-xx-/113		Γ
OCTOBER 2007	MORALLO	1400	0887-xx-xxx	\$ 579.80 PEK LIST PROVIDED BY SETO	T
OCTOBER 2007	MORALES	IVAIN	VVV VV 1000	679 80 PFR LIST PROVIDED BY SEIU	
TODE 0.007	OHIROS	DELIA	XXX-XX-0138	SOUR DEPOYINED BY SEILI	
JUI UBEN 2001		NEBEO	8081-xx-xx	S 5/8.80 PER LIST FILOVIDED DI SEIS	T
OCTOBER 2007	REYES	וארואר	0000	1 \$ 579.80 PER LIST PROVIDED BY SEIU	
TOPE 2007	REYFS	AIDE	NNSO-XX-XXX	\$ 570 ON DED LICT DROVIDED BY SFILL	
JUI UBER 2001		CERNIANDO	8925-xx-xx	373.00 7 - 17 - 17 () 1 - 17 ()	T
OCTOBER 2007	SALOMON		××-××-1063	\$ 579.80 PER LIST PROVIDED BY SEIU	T
CTOBER 2007	TURRUBIARTES (FLORES)/AURELIO	JAURELIO	SSSI VV VVV	# 42 225 AD	
I OBEIN 2001				5,555.45	1

EXHIBIT C TO DECLARATION OF **CRYSTAL SHANKS** IN SUPPORT OF PLAINTIFFS' MOTION FOR PARTIAL JUDGMENT BY DEFAULT

DELINQUENCIES FOR PERIOD OCTOBER 2005 THROUGH OCTOBER 2007 HOURS CALIFORNIA SERVICE EMPLOYEES HEALTH and WELFARE TRUST FUND A and B MAINTENANCE, INC, ACCOUNT #01300

NUTENEES NUTENEES NO. OF DAYS NO. OF										
PAYMENT CALCULATION OR DATE OF OF PACTUAL CALCULATION OR DATE OF OF D			END DATE OF							
PAYMENT ROCEITOR NO. OF DAYS NO. OF DAYS <t< td=""><td></td><td></td><td>CALCULATION</td><td>-</td><td></td><td></td><td>ESTIMATED</td><td>ESTIMATED OR ACTUAL</td><td>ESTIMATED</td><td>ESTIMATED</td></t<>			CALCULATION	-			ESTIMATED	ESTIMATED OR ACTUAL	ESTIMATED	ESTIMATED
DUE DATE CONTRIDITION CATAL	WORK	PAYMENT	RECEIPT OF		NO. OF	CONTRIBU-	OUTSTANDING CONTRIBUTIONS	LIQUIDATED DAMAGES	OR ACTUAL INTEREST	UK ACI UAL TOTALS
11/20/05 11/30/07 730 2 5570.20 \$1,40.40 \$200.00 \$218.70 \$570.20 12/20/05 11/30/07 670 2 \$570.20 \$1,40.40 \$200.00 \$218.70 \$200.00 \$219.90 \$200.00	MONTH	DUE DATE	CONTRIBUTIONS		רוווו בסיבובס	\$570.50	\$1 140 40	\$200.00	\$228.08	\$1,568.48
12/20005 11/3007 670 2 \$570.20 \$1,40.40 \$200.00 \$209.33 \$8 01/20/06 11/30/07 640 2 \$570.20 \$1,40.40 \$200.00 \$189.96 \$1 02/20/06 11/30/07 640 2 \$570.20 \$1,710.60 \$200.00 \$289.86 \$1 04/20/06 11/30/07 580 3 \$570.20 \$1,710.60 \$200.00 \$224.93 \$1 06/20/06 11/30/07 550 3 \$570.20 \$1,710.60 \$200.00 \$224.93 \$2 06/20/06 11/30/07 550 4 \$570.20 \$1,710.60 \$200.00 \$224.93 \$2 06/20/06 11/30/07 50 12 \$570.20 \$1,710.60 \$200.00 \$224.93 \$2 06/20/06 11/20/06 60 12 \$570.20 \$1,710.60 \$200.00 \$224.93 \$2 08/20/06 11/20/06 60 12 \$570.20 \$1,710.60 \$200.00	Oct 2005	11/20/05	11/30/07	730	7	4510.20	\$1,140.40	\$200.00	\$218.70	\$1,559.10
01/20/06 11/30/07 67/0 2 570/20 \$1/40/40 \$200.00 \$199.96 \$10.20/06 02/20/06 11/30/07 610 3 \$570/20 \$1/710.60 \$200.00 \$285.88 \$10.20/00 0.03/20/06 11/30/07 580 3 \$570/20 \$1/710.60 \$200.00 \$277.82 \$200.00 \$227.80 \$200.00 \$227.82 \$200.00 \$227.82 \$200.00 \$227.82 \$200.00 \$227.82 \$200.00 \$227.82 \$200.00 \$227.82 \$200.00 <t< td=""><td>Jov 2005</td><td>12/20/05</td><td>11/30/07</td><td>00/</td><td>7</td><td>\$570.20</td><td>\$1 140.40</td><td>\$200.00</td><td>\$209.33</td><td>\$1,549.73</td></t<>	Jov 2005	12/20/05	11/30/07	00/	7	\$570.20	\$1 140.40	\$200.00	\$209.33	\$1,549.73
02/20/06 11/30/07 040 2 \$570.20 \$1,710.60 \$200.00 \$285.88 \$8 03/20/06 11/30/07 580 3 \$570.20 \$1,710.60 \$200.00 \$227.76 \$8 04/20/06 11/30/07 580 3 \$570.20 \$1,710.60 \$200.00 \$227.76 \$8 0 6/20/06 11/30/07 520 4 \$570.20 \$1,710.60 \$200.00 \$224.93 \$8 0 6/20/06 11/30/07 520 4 \$570.20 \$1,710.60 \$200.00 \$224.93 \$8 0 09/20/06 11/30/07 60 12 \$570.20 PAID \$324.11 \$133.72 1 0/20/06 10/20/06 60 12 \$570.20 PAID \$220.00 \$57.85 1 1/20/06 10/20/06 10/20/06 60 12 \$570.20 PAID \$220.00 \$57.85 2 10/20/06 10/20/06 123 \$570.20 PAID \$2200.00 \$57.04 \$57.04 \$57.04 </td <td>Jec 2005</td> <td>01/20/06</td> <td>11/30/07</td> <td>670</td> <td>2</td> <td>\$570.20</td> <td>\$1,140.40</td> <td>\$200.00</td> <td>\$199.96</td> <td>\$1,540.36</td>	Jec 2005	01/20/06	11/30/07	670	2	\$570.20	\$1,140.40	\$200.00	\$199.96	\$1,540.36
03/20/06 11/30/07 580 3 \$570.20 \$1/10.60 \$271.82 \$271.82 04/20/06 11/30/07 580 3 \$570.20 \$1,710.60 \$200.00 \$257.76 \$3 0 06/20/06 11/30/07 520 4 \$570.20 \$1,710.60 \$200.00 \$257.76 \$3 0 06/20/06 11/30/07 520 4 \$570.20 \$1,710.60 \$200.00 \$24.93 \$3 0 06/20/06 0 7/20/06 0 7/20/06 0 12 \$570.20 \$2,288.30 \$50.00 \$524.93 \$3 0 09/20/06 0 1/20/06 0 1/20/06 0 1 1 \$570.20 PAID \$320.10 \$71.85 1 1/20/06 0 1/20/06 0 1/20/07 1 \$570.20 PAID \$200.00 \$71.24 1 1/20/07 0 3/23/07 1 \$570.20 PAID \$200.00 \$71.24 2 1/20/06 0 1/20/07 0 3/23/07 63 4 \$570.20 PAID \$200.00 \$71.24	Jan 2006	02/20/06	11/30/07	040	7 %	\$570.20	\$1,710.60	\$200.00	\$285.88	\$2,196.48
04/20/06 11/30/07 580 3 \$570.20 \$1,710.60 \$200.00 \$257.76 \$8 06/20/06 11/30/07 550 4 \$570.20 \$7,70.60 \$200.00 \$324.93 \$8 06/20/06 11/30/07 520 4 \$570.20 \$7,280.80 \$50.00 \$8.27.32 08/20/06 10/20/06 0 12 \$570.20 PAID \$324.11 \$8.00 08/20/06 10/20/06 0 12 \$570.20 PAID \$342.11 \$8.18.72 10/20/06 01/06/07 76 10 \$570.20 PAID \$320.00 \$71.85 11/20/06 01/06/07 123 4 \$570.20 PAID \$200.00 \$71.85 11/20/06 03/23/07 93 5 \$570.20 PAID \$200.00 \$71.84 02/20/07 04/26/07 66 4 \$570.20 PAID \$200.00 \$31.24 02/20/07 04/26/07 66 4 \$570.20	eb 2006	03/20/06	11/30/07	010	2 6	\$570.20	\$1,710.60	\$200.00	\$271.82	\$2,182.42
05/20/06 1/130/07 550 3 570.20 \$22,280.80 \$200.00 \$324.93 \$3 06/20/06 1/130/07 520 4 \$570.20 \$2,280.80 \$200.00 \$50.00 07/20/06 07/20/06 0 12 \$570.20 PAID \$342.11 \$123.72 08/20/06 10/20/06 60 12 \$570.20 PAID \$370.03 \$78.81 10/20/06 01/06/07 76 10 \$570.20 PAID \$370.03 \$78.85 10/20/06 03/23/07 123 4 \$570.20 PAID \$76.85 \$78.85 11/20/06 03/23/07 63 5 \$570.20 PAID \$76.85 \$78.85 11/20/06 03/23/07 63 4 \$570.20 PAID \$200.00 \$52.49 01/20/07 04/26/07 63 4 \$570.20 PAID \$200.00 \$31.24 02/20/07 04/26/07 66 4 \$570.20 PAID	Mar 2006	04/20/06	11/30/07	086	0 0	\$570.20	\$1 710.60	\$200.00	\$257.76	\$2,168.36
06/20/06 11/30/07 520 4 570,220 PAID \$0.00 \$0.00 07/20/06 07/20/06 0 12 \$570,20 PAID \$342,11 \$123,72 08/20/06 10/20/06 30 13 \$570,20 PAID \$370,63 \$73.11 10/20/06 01/20/06 30 13 \$570,20 PAID \$370,63 \$73.11 10/20/06 01/20/06 03/23/07 76 10 \$570,20 PAID \$200,00 \$76.85 11/20/06 03/23/07 123 4 \$570,20 PAID \$200,00 \$77.68 01/20/07 03/23/07 63 5 \$570,20 PAID \$200,00 \$72.49 01/20/07 04/26/07 66 4 \$570,20 PAID \$200,00 \$3.14 05/20/07 04/26/07 66 4 \$570,20 PAID \$200,00 \$3.14 05/20/07 04/26/07 66 4 \$570,20 PAID \$200	Apr 2006	05/20/06	11/30/07	220	0	\$570.20	\$2 280.80	\$200.00	\$324.93	\$2,805.73
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09/20/06 10/20/06 30 13 \$570.20 PAID \$285.10 \$718.72 10/20/06 01/06/07 76 10 \$570.20 PAID \$285.10 \$76.85 11/20/06 03/23/07 123 4 \$570.20 PAID \$200.00 \$72.64 11/20/06 03/23/07 63 5 \$570.20 PAID \$200.00 \$72.64 01/20/07 03/23/07 66 4 \$570.20 PAID \$200.00 \$72.49 02/20/07 04/26/07 66 4 \$570.20 PAID \$200.00 \$32.49 03/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$45.77 04/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$52.49 05/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$45.77 05/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$53.37	Jul 2006	08/20/06	10/20/06	09	7 7	\$210.20 \$570.20	PAID	\$370.63	\$73.11	\$443.74
10/20/06 01/06/07 76 10 \$570.20 PAID \$200.00 \$76.85 11/20/06 03/23/07 123 4 \$570.20 PAID \$200.00 \$72.64 11/20/06 03/23/07 123 5 \$570.20 PAID \$200.00 \$72.64 12/20/06 03/23/07 63 4 \$570.20 PAID \$200.00 \$41.24 01/20/07 04/26/07 66 4 \$570.20 PAID \$200.00 \$42.49 02/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$3.74 03/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$3.74 04/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$45.27 05/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$45.27 06/20/07 11/30/07 160 15 \$579.80 \$86.97.00 \$434.85 \$3	Aug 2006	09/20/06	10/20/06	30	13	4570.20	PAID	\$285.10	\$118.72	\$403.82
11/20/06 03/23/07 123 4 \$570.20 PAID \$200.00 \$72.64 12/20/06 03/23/07 93 5 \$570.20 PAID \$200.00 \$49.20 01/20/07 03/23/07 63 4 \$570.20 PAID \$200.00 \$41.24 02/20/07 04/26/07 66 4 \$570.20 PAID \$200.00 \$3.74 03/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$3.74 04/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$345.27 05/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$343.85 06/20/07 11/30/07 160 15 \$579.80 \$8,697.00 \$434.85 \$389.75 08/20/07 11/30/07 100 18 \$579.80 \$1,0436.40 \$608.77 \$385.53 10/20/07 11/30/07 40 22 \$579.80 \$1,2755.60 \$666.77 </td <td>Sep 2006</td> <td>10/20/06</td> <td>01/06/07</td> <td>9)</td> <td>2 -</td> <td>4510.20</td> <td>PAID</td> <td>\$200.00</td> <td>\$76.85</td> <td>\$276.85</td>	Sep 2006	10/20/06	01/06/07	9)	2 -	4510.20	PAID	\$200.00	\$76.85	\$276.85
12/20/06 03/23/07 93 9 970.20 FAID \$200.00 \$49.20 01/20/07 03/23/07 63 5 \$570.20 PAID \$200.00 \$41.24 02/20/07 04/26/07 66 4 \$570.20 PAID \$200.00 \$3.74 03/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$3.74 04/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$3.74 05/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$3.84.27 05/20/07 11/30/07 160 15 \$579.80 \$8,697.00 \$434.85 \$389.72 08/20/07 11/30/07 100 18 \$579.80 \$10,436.40 \$521.82 \$285.95 08/20/07 11/30/07 70 21 \$579.80 \$12,756.60 \$60.77 \$36.87.78 \$36.39.78 10/20/07 11/30/07 10 22 \$579.80 \$13,	Oct 2006	11/20/06	03/23/07	123	4 0	\$510.20	PAID	\$200.00	\$72.64	\$272.64
01/20/07 03/23/07 63 9 \$570.20 PAID \$200.00 \$41.24 02/20/07 04/26/07 66 4 \$570.20 PAID \$200.00 \$22.49 03/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$3.74 04/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$45.27 05/20/07 07/17/07 57 5 \$570.20 PAID \$200.00 \$45.27 06/20/07 11/30/07 160 15 \$579.80 \$8,697.00 \$434.85 \$309.75 08/20/07 11/30/07 100 18 \$579.80 \$10,436.40 \$521.82 \$285.92 08/20/07 11/30/07 70 21 \$579.80 \$12,175.80 \$608.79 \$139.78 10/20/07 11/30/07 40 22 \$579.80 \$12,755.60 \$606.77 \$36.53 11/20/07 11/20/07 10 23 \$579.80 \$13,335.40	Nov 2006	12/20/06	03/23/07	93	2	\$510.20	PAID	\$200.00	\$49.20	\$249.20
02/20/07 04/26/07 6b 4 \$570.20 PAID \$200.00 \$22.49 03/20/07 04/26/07 36 4 \$570.20 PAID \$200.00 \$3.74 04/20/07 04/26/07 6 4 \$570.20 PAID \$200.00 \$45.27 05/20/07 07/17/07 57 5 \$579.80 \$8,697.00 \$434.85 \$381.23 06/20/07 11/30/07 130 15 \$579.80 \$10,436.40 \$521.82 \$285.92 08/20/07 11/30/07 100 18 \$579.80 \$10,436.40 \$51.78 \$139.78 09/20/07 11/30/07 70 21 \$579.80 \$12,755.60 \$608.77 \$36.53 10/20/07 11/30/07 40 22 \$579.80 \$12,755.60 \$66.77 \$36.53 11/20/07 11/30/07 10 23 \$579.80 \$13,335.40 \$4,010.15 \$1	Dec 2006	01/20/07	03/23/07	63	0	\$570.20	PAID	\$200.00	\$41.24	\$241.24
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06/20/07 11/30/07 160 19 \$579.80 \$8,697.00 \$434.85 \$309.75 07/20/07 11/30/07 100 18 \$579.80 \$10,436.40 \$521.82 \$285.92 08/20/07 11/30/07 70 21 \$579.80 \$12,175.80 \$608.79 \$139.78 10/20/07 11/30/07 40 22 \$579.80 \$13,335.40 \$666.77 \$36.53 11/20/07 11/30/07 10 23 \$579.80 \$13,335.40 \$666.77 \$36.53 11/20/07 11/30/07 10 23 \$579.80 \$13,335.40 \$4,010.15 \$26.00	Apr 2007	05/20/07	0//1//0/	1007	5 4	\$570.50	88 697 00	\$434.85	\$381.23	\$9,513.08
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08/20/07 11/30/07 100 10 21 \$579.80 \$12,175.80 \$608.79 \$233.50 09/20/07 11/30/07 40 22 \$579.80 \$12,755.60 \$666.77 \$36.53 10/20/07 11/30/07 10 23 \$579.80 \$13,335.40 \$666.77 \$36.53 11/20/07 11/30/07 10 23 \$579.80 \$13,335.40 \$4,010.15 \$1	Jun 2007	07/20/07	11/30/07	130	0,7	\$579.80	\$10.436.40	\$521.82	\$285.92	\$11,244.14
09/20/07 11/30/07 70 21 20.00 \$12,755.60 \$637.78 \$139.78 10/20/07 11/30/07 40 22 \$579.80 \$13,335.40 \$666.77 \$36.53 11/20/07 11/30/07 10 23 \$579.80 \$13,335.40 \$666.77 \$36.53	Jul 2007	08/20/07	11/30/07	100	01 0	\$579.80	\$12,175.80	\$608.79	\$233.50	\$13,018.09
10/20/07 11/30/07 40 22 \$579.80 \$13,335.40 \$666.77 \$36.53 11/20/07 11/30/07 10 23 \$579.80 \$13,335.40 \$4,010.15 \$36.53	Aug 2007	09/20/07	11/30/07	0)	17	\$579.80	\$12,755.60	\$637.78	\$139.78	\$13,533.16
11/20/07 11/30/07 10 20 4,010.15 \$78,071.40 \$7,302.70 \$4,010.15	Sep 2007	10/20/07	11/30/07	40	23	\$579.80	\$13,335.40	\$666.77	\$36.53	\$14,038.70
	Oct 2007	11/20/07	11/38/10/		67		\$78,071.40	\$7,302.70	\$4,010.15	\$89,384.25
	TOTALS									

ESTIMATED TOT AL DUE

89,384.25

